

Application No. 09/752,199  
Response dated June 29, 2005  
Reply to Office Action dated April 1, 2005  
Express Mail EV723447731US

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Remarks/Arguments

The Office Action dated April 1, 2005, has been noted and its contents carefully studied. In light of the foregoing amendments, reconsideration of the rejection under 35 U.S.C §103 and §112 is hereby courteously requested.

Turning to the 35 U.S.C §112 rejection, it is noted that claims 2 and 14 have been amended in light of the amendment to claim 1 to recite that the encoding step comprises structuring the field of the SCSI request which is direct from the workstation in a manner substantially the same as a direct SCSI request from a host system which makes up part of the computer system and which is normally transmitted through a network. As such, it is believed that the limitation refers to structuring the SCSI request from the workstation to be transferred directly over a TCP/IP connection as distinguished from sending a SCSI request directly from the host system through the network which would result in interrupting the host system performing other requests, while the SCSI request is passed using the fibre pass through, through the host bus adapters of the host system.

Turning now to the invention as defined broadly in the claims, it is noted that amendments have been made to independent claims 1 and 13 to clarify that the direct TCP/IP connection is established between a workstation making up a part of the computer system and the target device which is all on a network, such that the request goes directly from the workstation to the target device and the request IP/ID of the SCSI request is returned directly from the target device to the workstation thereby avoiding interrupting other actions being taken by the host system through the network with the target device.

It is respectfully urged that the claimed invention is not obvious from the cited references as will become more clearly evident from the following detailed discussion of the references presented herein for the Examiner's kind consideration.

U.S. Patent No. 6,470,382 to Wang et al.

U.S. Patent No. 6,470,382 to Wang et al. (hereinafter "Wang") teaches a method to dynamically attach, manage and access a LAN-attached SCSI and netSCSI device to a network. More specifically, the SCSI requests are transmitted throughout the network on the network itself and there is no teaching or suggestion of the concept of having a direct connection where SCSI

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requests are transmitted over TCP/IP as is done from the workstation to the device attached thereto. As already noted in the application and description of the invention, Applicant's invention provides for such a direct connection to avoid interrupting the host while it attends to other requests on the network.

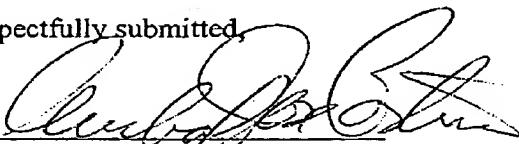
The section referred to by the Examiner shows at column 6, lines 31 on, that of the netSCSI device is coupled to a server through a network link. This is directly contrary to Applicant's claimed invention as now clarified in the claims. For this reason, it is respectfully urged that the claimed invention as broadly recited in the claims is not obvious in light of Wang.

Other features of the invention are clearly not taught or suggested by Wang, as set forth in new dependent claims 24 and 25 which provides for software at the host and at the workstation for cooperating with each other such that the software is operated to construct SCSI requests to send out over a direct TCP/IP connection between the workstation and the target device.

For the foregoing reasons, it is respectfully urged that the claimed clearly defines subject matter under 35 U.S.C §103 and/or §112. Nonetheless, should the Examiner still have any comments, questions or suggestions of a nature necessary to expedite prosecution of the application or to place the case in condition for allowance, he is courteously requested to telephone the undersigned at the number listed below.

Dated: June 29, 2005

Respectfully submitted,



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Enclosures

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